

**DOCKETED**

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*Comment Received From: First Solar, Inc.*  
*Submitted On: 10/9/2019*  
*Docket Number: 19-BSTD-08*

**Support for the Community Shared Solar Electric Generation System  
Application by Sacramento Municipal Utility District (SMUD)**

*Additional submitted attachment is included below.*

October 9, 2019

California Energy Commission  
Docket 2019-BSTD-08  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

RE: Large Scale Community Solar Application by the Sacramento Municipal Utility District

First Solar expresses our strong support for the Community Shared Solar Electric Generation System Application by the Sacramento Municipal Utility District (SMUD). SMUD is applying to administer a community solar program option meeting the requirements under Section 10-115 of the 2019 Building Standards.

First Solar is a leading global supplier of comprehensive PV solar systems and develops, finances, engineers, constructs and operates some of the world's most successful PV projects. First Solar is the largest U.S.-based module manufacturer with over 25,000 MW of our module technology deployed globally. In California alone, First Solar has developed and/or constructed 32 utility-scale projects using our thin-film module technology.

In addition to First Solar's leadership in the solar industry, we have been an innovator and leader in the U.S. on community solar, partnering with utilities as well as independent developers to create effective community solar projects. Through these partnerships, we have provided business and operational support in addition to the use of our thin-film modules on community solar projects throughout the U.S.

Our experience across multiple approaches to community solar programs provides First Solar with an important perspective that leads us to support the Community Solar Shared Generation System Application proposed by SMUD. The proposal from SMUD leverages key benefits that lead to community solar success by reducing costs and providing ratepayers with these benefits over a long-term period. The economies of scale inherent in larger community solar installations allow SMUD to provide occupants with long-term certainty that they will receive a net benefit under the program.

Section 10-115 allows a community solar program that meets Community Shared Solar Electric Generation System requirements to be used by a builder/developer as a compliance alternative to the onsite or rooftop photovoltaics required by Section 150.1(b)1. California continues to need diverse options to help meet carbon reduction goals. Large scale solar can provide a stable cost-effective solar development that can be located and

oriented to better meet community or system grid needs while also providing good jobs and the benefits of solar.

The community solar option needs to be available for builders to consider before the January 1, 2020 effective date of the 2019 Building Standards. This is particularly true for the low-rise multi-family developments affected by the Standards, where space for on-site solar may be scarce.

We strongly encourage timely adoption by the Commission of SMUD's Community Shared Solar Electric Generation System Application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Meehan', written in a cursive style.

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